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Devices Co., Ltd.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No.: 4:07-cv-05944 JST

MDL No. 1917

This document relates to:

*ALL DIRECT PURCHASER ACTIONS*

**ANSWER OF IRICO DISPLAY DEVICES  
CO., LTD. TO DIRECT PURCHASER  
PLAINTIFFS' CONSOLIDATED  
AMENDED COMPLAINT**

Trial Date: None Set

ANSWER OF IRICO DISPLAY DEVICES Co.,  
LTD. TO DIRECT PURCHASER PLAINTIFFS'  
CONSOLIDATED AMENDED COMPLAINT

CASE No.: 4:07-cv-05944-JST

1 Defendant Irico Display Devices Co., Ltd. (“Display”), by and through its undersigned  
2 counsel of record, answer the Direct Purchaser Plaintiffs’ (“Plaintiffs”) Consolidated Amended  
3 Complaint (the “Complaint”) and allege additional or affirmative defenses as follows. The  
4 Complaint contains numerous headings, which are not allegations and do not require a response from  
5 Display. For ease of reference, the headings in this Answer correspond to the headings in the  
6 Complaint. To the extent that any headings are construed as allegations, they are denied. Display  
7 denies each and every allegation in all portions of the Amended Complaint not contained in  
8 numbered paragraphs. To the extent that the Complaint’s allegations concern persons and/or entities  
9 other than Display, Display denies that such allegations support any claim for relief against Display.

## 10 **I. INTRODUCTION**

11 1. Display admits that Plaintiffs purport to bring this case as a class action on behalf of  
12 the persons described in the first sentence of Paragraph 1 of the Complaint, but Display denies that  
13 this action is appropriate under Rule 23 of the Federal Rules of Civil Procedure. Display further  
14 denies that the “Class Period” defined by Plaintiffs is a properly defined class period. Display lacks  
15 sufficient knowledge or information to form a belief as to the truth of the allegations in the second  
16 sentence of Paragraph 1, and therefore denies the allegations. Display admits that Plaintiffs define  
17 certain terms in the third, fourth, and fifth sentences of Paragraph 1, but denies that these terms are  
18 properly defined. Display denies the remaining allegations in Paragraph 1.

19 2. Display lacks sufficient knowledge or information to form a belief as to the truth of  
20 the allegations in Paragraph 2 of the Complaint and therefore denies the allegations.

21 3. Display lacks knowledge or information sufficient to form a belief as to the truth of  
22 the allegations contained in the first sentence of Paragraph 3 of the Complaint, and therefore denies  
23 the allegations. The second sentence of Paragraph 3 contains characterizations, conclusions, and  
24 legal argument to which no responsive pleading is required. To the extent that a response is required,  
25 To the extent that a response is required, Display denies the allegations that are directed at Display.  
26 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
27 allegations in Paragraph 3, and therefore denies the allegations.

1           4.       Display denies the allegations in Paragraph 4 of the Complaint that are directed at  
2 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
3 remaining allegations in Paragraph 4, and therefore denies the allegations.

4           5.       Display denies the allegations in Paragraph 5 of the Complaint that are directed at  
5 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
6 remaining allegations in Paragraph 5, and therefore denies the allegations.

7           6.       Display denies the allegations in Paragraph 6 of the Complaint that are directed at  
8 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
9 remaining allegations in Paragraph 6, and therefore denies the allegations.

10          7.       Display lacks sufficient knowledge or information to form a belief as to the truth of  
11 the allegations in Paragraph 7 of the Complaint, and therefore denies the allegations.

## 12                               **II. JURISDICTION AND VENUE**

13          8.       The allegations in Paragraph 8 of the Complaint contain characterizations,  
14 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
15 response is required, Display denies the allegations contained in Paragraph 8 in their entirety, except  
16 admits that Plaintiffs purport to bring this action pursuant to the statute identified therein and the  
17 relief sought therein.

18          9.       The allegations in Paragraph 9 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations contained in Paragraph 9 in their entirety, except  
21 admits that Plaintiffs purport to base jurisdiction on the statutes identified therein.

22          10.       The allegations in Paragraph 10 of the Complaint contain characterizations,  
23 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
24 response is required, Display denies that it resides in this judicial district or is licensed to do business  
25 in this judicial district. Display lacks sufficient knowledge or information to form a belief as to the  
26 truth of the remaining allegations in Paragraph 10, and therefore denies the allegations.

**III. PARTIES**

11. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 11 of the Complaint, and therefore denies the allegations.

12. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 12 of the Complaint, and therefore denies the allegations.

13. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 13 of the Complaint, and therefore denies the allegations.

14. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 14 of the Complaint, and therefore denies the allegations.

15. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 15 of the Complaint, and therefore denies the allegations.

16. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 16 of the Complaint, and therefore denies the allegations.

17. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 17 of the Complaint, and therefore denies the allegations.

18. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 18 of the Complaint, and therefore denies the allegations.

19. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 19 of the Complaint, and therefore denies the allegations.

20. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 20 of the Complaint, and therefore denies the allegations.

21. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 21 of the Complaint, and therefore denies the allegations.

22. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 22 of the Complaint, and therefore denies the allegations.

23. Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 23 of the Complaint, and therefore denies the allegations.

1           24.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
2 the allegations in Paragraph 24 of the Complaint, and therefore denies the allegations.

3           25.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
4 the allegations in Paragraph 25 of the Complaint, and therefore denies the allegations.

5           26.     Paragraph 26 describes the terminology used in the Complaint, to which no response  
6 is required.

7           27.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
8 the allegations in Paragraph 27 of the Complaint, and therefore denies the allegations.

9           28.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
10 the allegations in Paragraph 28 of the Complaint, and therefore denies the allegations.

11          29.     Paragraph 29 describes the terminology used in the Complaint, to which no response  
12 is required.

13          30.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
14 the allegations in Paragraph 30 of the Complaint, and therefore denies the allegations.

15          31.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
16 the allegations in Paragraph 31 of the Complaint, and therefore denies the allegations.

17          32.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
18 the allegations in Paragraph 32 of the Complaint, and therefore denies the allegations.

19          33.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
20 the allegations in Paragraph 33 of the Complaint, and therefore denies the allegations.

21          34.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
22 the allegations in Paragraph 34 of the Complaint, and therefore denies the allegations.

23          35.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
24 the allegations in Paragraph 35 of the Complaint, and therefore denies the allegations.

25          36.     Paragraph 36 describes the terminology used in the Complaint, to which no response  
26 is required.

27          37.     Display admits that Irico Group Corp. ("Group") is a Chinese entity with its  
28 headquarters at the address in Xianyang, Shaanxi Province, People's Republic of China listed in

1 Paragraph 37. Display also admits that it is a related entity to Group. Display denies any and all  
2 allegations in Paragraph 37 that Display manufactured, distributed, or sold finished products  
3 containing CRTs. Display also denies that Display manufactured, distributed, or sold color picture  
4 tubes, color display tubes, or finished products containing CRTs, directly or indirectly, to the United  
5 States. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
6 remaining allegations in Paragraph 37, and therefore denies the allegations.

7 38. Display admits that as of November 27, 2007, Irico Group Electronics Co., Ltd.  
8 (“Electronics”) was located at the address listed in the first sentence of Paragraph 38 of the  
9 Complaint. Display denies any and all allegations in Paragraph 38 that Display manufactured,  
10 distributed, or sold finished products containing CRTs. Display also denies that Display  
11 manufactured, distributed, or sold color picture tubes, color display tubes, or finished products  
12 containing CRTs, directly or indirectly, to the United States. Display lacks sufficient knowledge or  
13 information to form a belief as to the truth of the remaining allegations in Paragraph 38, and therefore  
14 denies the allegations.

15 39. Display admits that as of November 27, 2007, the allegations in the first sentence of  
16 Paragraph 39 of the Complaint were correct. Regarding the second sentence of Paragraph 39,  
17 Display admits that Group has an ownership interest in Display but denies the remaining allegations.  
18 Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations  
19 in the third sentence of Paragraph 39, and therefore denies the allegations. Display denies the  
20 allegations in the fourth and fifth sentences of Paragraph 39.

21 40. Paragraph 40 describes the terminology used in the Complaint, to which no response  
22 is required.

23 41. Display lacks sufficient knowledge or information to form a belief as to the truth of  
24 the allegations in Paragraph 41 of the Complaint, and therefore denies the allegations.

25 42. Display lacks sufficient knowledge or information to form a belief as to the truth of  
26 the allegations in Paragraph 42 of the Complaint, and therefore denies the allegations.

27 43. Display lacks sufficient knowledge or information to form a belief as to the truth of  
28 the allegations in Paragraph 43 of the Complaint, and therefore denies the allegations.

1           44.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
2 the allegations in Paragraph 44 of the Complaint, and therefore denies the allegations.

3           45.     Paragraph 45 describes the terminology used in the Complaint, to which no response  
4 is required.

5           46.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
6 the allegations in Paragraph 46 of the Complaint, and therefore denies the allegations.

7           47.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
8 the allegations in Paragraph 47 of the Complaint, and therefore denies the allegations.

9           48.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
10 the allegations in Paragraph 48 of the Complaint, and therefore denies the allegations.

11          49.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
12 the allegations in Paragraph 49 of the Complaint, and therefore denies the allegations.

13          50.     Paragraph 50 describes the terminology used in the Complaint, to which no response  
14 is required.

15          51.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
16 the allegations in Paragraph 51 of the Complaint, and therefore denies the allegations.

17          52.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
18 the allegations in Paragraph 52 of the Complaint, and therefore denies the allegations.

19          53.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
20 the allegations in Paragraph 53 of the Complaint, and therefore denies the allegations.

21          54.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
22 the allegations in Paragraph 54 of the Complaint, and therefore denies the allegations.

23          55.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
24 the allegations in Paragraph 55 of the Complaint, and therefore denies the allegations.

25          56.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
26 the allegations in Paragraph 56 of the Complaint, and therefore denies the allegations.

27          57.     Paragraph 57 describes the terminology used in the Complaint, to which no response  
28 is required.

1           58.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
2 the allegations in Paragraph 58 of the Complaint, and therefore denies the allegations.

3           59.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
4 the allegations in Paragraph 59 of the Complaint, and therefore denies the allegations.

5           60.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
6 the allegations in Paragraph 60 of the Complaint, and therefore denies the allegations.

7           61.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
8 the allegations in Paragraph 61 of the Complaint, and therefore denies the allegations.

9           62.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
10 the allegations in Paragraph 62 of the Complaint, and therefore denies the allegations.

11          63.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
12 the allegations in Paragraph 63 of the Complaint, and therefore denies the allegations.

13          64.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
14 the allegations in Paragraph 64 of the Complaint, and therefore denies the allegations.

15          65.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
16 the allegations in Paragraph 65 of the Complaint, and therefore denies the allegations.

17          66.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
18 the allegations in Paragraph 66 of the Complaint, and therefore denies the allegations.

19          67.     Paragraph 67 describes the terminology used in the Complaint, to which no response  
20 is required.

21          68.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
22 the allegations in Paragraph 68 of the Complaint, and therefore denies the allegations.

23          69.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
24 the allegations in Paragraph 69 of the Complaint, and therefore denies the allegations.

25          70     Display lacks sufficient knowledge or information to form a belief as to the truth of  
26 the allegations in Paragraph 70 of the Complaint, and therefore denies the allegations.

27          71.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
28 the allegations in Paragraph 71 of the Complaint, and therefore denies the allegations.



1           72.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
2 the allegations in Paragraph 72 of the Complaint, and therefore denies the allegations.

3           73.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
4 the allegations in Paragraph 73 of the Complaint, and therefore denies the allegations.

5           74.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
6 the allegations in Paragraph 74 of the Complaint, and therefore denies the allegations.

7           75.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
8 the allegations in Paragraph 75 of the Complaint, and therefore denies the allegations.

9           76.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
10 the allegations in Paragraph 76 of the Complaint, and therefore denies the allegations.

11          77.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
12 the allegations in Paragraph 77 of the Complaint, and therefore denies the allegations.

13          78.     Paragraph 78 describes the terminology used in the Complaint, to which no response  
14 is required.

15          79.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
16 the allegations in Paragraph 79 of the Complaint, and therefore denies the allegations.

17          80.     Display lacks sufficient knowledge or information to form a belief as to the truth of  
18 the allegations in Paragraph 80 of the Complaint, and therefore denies the allegations.

19                   **IV. AGENTS AND CO-CONSPIRATORS**

20          81.     The allegations in Paragraph 81 of the Complaint contain characterizations,  
21 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
22 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
23 truth of the allegations in Paragraph 81, and therefore denies the allegations.

24          82.     The allegations in Paragraph 82 of the Complaint constitute characterizations of the  
25 allegations of Plaintiffs' Complaint to which no responsive pleading is required.

26          83.     The allegations in Paragraph 83 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 83 that are directed at Display.

1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 83, and therefore denies the allegations.

3 84. The allegations in Paragraph 84 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
5 response is required, Display denies the allegations in Paragraph 84 that are directed at Display.  
6 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
7 allegations in Paragraph 84, and therefore denies the allegations.

#### 8 **V. CLASS ACTION ALLEGATIONS**

9 85. The allegations in Paragraph 85 of the Complaint contain characterizations,  
10 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
11 response is required, Display admits that Plaintiffs purport to bring this action pursuant to the  
12 provisions of Rule 23 of the Federal Rules of Civil Procedure but denies that this action is appropriate  
13 under Rule 23. Display further denies that the “Class Period” defined by Plaintiffs is a properly  
14 defined class period. Display lacks sufficient knowledge or information to form a belief as to the  
15 truth of the remaining allegations in Paragraph 85, and therefore denies the allegations.

16 86. The allegations in Paragraph 86 of the Complaint contain characterizations,  
17 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
18 response is required, Display denies that this action is appropriate under Rule 23 of the Federal Rules  
19 of Civil Procedure. Display lacks sufficient knowledge or information to form a belief as to the truth  
20 of the remaining allegations and therefore denies the allegations.

21 87. The allegations in Paragraph 87 of the Complaint contain characterizations,  
22 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
23 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
24 truth of the allegations and therefore denies the allegations.

25 88. The allegations in Paragraph 88 of the Complaint contain characterizations,  
26 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
27 response is required, Display denies the allegations.  
28

1           89     The allegations in Paragraph 89 of the Complaint contain characterizations,  
2 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
3 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
4 truth of the allegations and therefore denies the allegations.

5           90.    The allegations in Paragraph 90 of the Complaint contain characterizations,  
6 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
7 response is required, Display denies the allegations.

8           91.    The allegations in Paragraph 91 of the Complaint contain characterizations,  
9 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
10 response is required, Display denies the allegations.

11          92.    The allegations in Paragraph 92 of the Complaint contain characterizations,  
12 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
13 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
14 truth of the allegations and therefore denies the allegations.

15          93.    The allegations in Paragraph 93 of the Complaint contain characterizations,  
16 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
17 response is required, Display denies the allegations.

18          94.    The allegations in Paragraph 94 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations.

21          95.    The allegations in Paragraph 95 of the Complaint contain characterizations,  
22 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
23 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
24 truth of the allegations and therefore denies the allegations.

25                           **VI. TRADE AND COMMERCE**

26          96.    The allegations in Paragraph 96 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 96 that are directed at Display.

1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 96, and therefore denies the allegations.

3 97. The allegations in Paragraph 97 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. Display denies the  
5 allegations in Paragraph 97 of the Complaint that are directed at Display. Display lacks sufficient  
6 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
7 97, and therefore denies the allegations.

8 98. The allegations in Paragraph 98 of the Complaint contain characterizations,  
9 conclusions and legal argument to which no responsive pleading is required. To the extent that a  
10 response is required, Display denies the allegations in Paragraph 98 that are directed at Display.  
11 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
12 allegations in Paragraph 96, and therefore denies the allegations.

## 13 **VII. FACTUAL ALLEGATIONS**

14 99. Display admits that the allegations in Paragraph 99 of the Complaint generally  
15 describe CRT technology but denies that these descriptions are accurate or complete.

16 100. Display admits that the allegations in Paragraph 100 of the Complaint generally  
17 describe CRT technology but denies that these descriptions are accurate or complete.

18 101. Display admits that the allegations in Paragraph 101 of the Complaint generally  
19 describe CRT technology but denies that these descriptions are accurate or complete.

20 102. Display admits that the allegations in Paragraph 102 of the Complaint generally  
21 describe CRT technology but denies that these descriptions are accurate or complete.

22 103. Display admits that the allegations in Paragraph 103 of the Complaint generally  
23 describe CRT technology but denies that these descriptions are accurate or complete.

24 104. The allegations in Paragraph 104 of the Complaint contain characterizations,  
25 conclusions, and legal argument to which no responsive pleading is required. To the extent a  
26 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
27 truth of the allegations in the first two sentences in Paragraph 104, and therefore denies the  
28 allegations. The third sentence purports to quote or describe reports from Stanford Resources, Inc.

1 Display states that the original reports are the best source for their full content and context. To the  
2 extent a response is required, Display lacks sufficient knowledge or information to form a belief as  
3 to the truth of the allegations and therefore denies the allegations.

4 105. Display admits that the allegations in Paragraph 105 of the Complaint generally  
5 describe CRT technology but denies that these descriptions are accurate or complete.

6 106. The allegations in Paragraph 106 of the Complaint contain characterizations,  
7 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
8 response is required, Display denies the allegations in Paragraph 106 that are directed at Display.  
9 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
10 allegations in Paragraph 106, and therefore denies the allegations.

11 107. The allegations in Paragraph 107 of the Complaint contain characterizations,  
12 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
13 response is required, Display denies the allegations in Paragraph 107 that are directed at Display.  
14 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
15 allegations in Paragraph 107, and therefore denies the allegations.

16 108. Display lacks sufficient knowledge or information to form a belief as to the truth of  
17 the allegations in the first two sentences of Paragraph 108 of the Complaint, and therefore denies the  
18 allegations. The third sentence purports to quote or describe reports from iSuppli Corp. Display  
19 states that the original reports are the best source for their full content and context. To the extent a  
20 response is required, Display lacks sufficient knowledge or information to form a belief as to the  
21 truth of the allegations and therefore denies the allegations.

22 109. The allegations in Paragraph 109 of the Complaint purport to quote or describe  
23 reports from iSuppli Corp. Display states that the original reports are the best source for their full  
24 content and context. To the extent a response is required, Display lacks sufficient knowledge or  
25 information to form a belief as to the truth of the allegations and therefore denies the allegations.

26 110. The allegations in the first, fourth, and fifth sentences of Paragraph 110 of the  
27 Complaint contain characterizations and conclusions to which no responsive pleading is required.  
28 To the extent that a response is required, Display denies the allegations contained in the first sentence

1 of Paragraph 110. Display lacks sufficient knowledge or information to form a belief as to the truth  
2 of the allegations in the fourth and fifth sentences of Paragraph 110, and therefore denies the  
3 allegations. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
4 allegations in the second and third sentences of Paragraph 110, and therefore denies the allegations.  
5 The allegations in the sixth sentence of Paragraph 110 purport to quote or describe a report from  
6 DisplaySearch Inc. Display states that the original report is the best source for its full content and  
7 context. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
8 allegations in the sixth sentence of Paragraph 110, and therefore denies the allegations.

9        111. The allegations in the first sentence of Paragraph 111 purport to quote or describe a  
10 report from DisplaySearch Inc. Display states that the original report is the best source for its full  
11 content and context. Display lacks sufficient knowledge or information to form a belief as to the  
12 truth of the allegations in the first sentence of Paragraph 111, and therefore denies the allegations.  
13 The allegations in the second sentence of Paragraph 111 contain characterizations, conclusions and  
14 legal argument to which no responsive pleading is required. To the extent that a response is required,  
15 Display denies the allegations that are directed at Display. Display lacks sufficient knowledge or  
16 information to form a belief as to the truth of the remaining allegations, and therefore denies the  
17 allegations.

18        112. The allegations in Paragraph 112 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations in Paragraph 112 that are directed at Display.  
21 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
22 allegations in Paragraph 112, and therefore denies the allegations.

23        113. Display denies the allegations in Paragraph 113 of the Complaint that are directed at  
24 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
25 remaining allegations in Paragraph 113, and therefore denies the allegations.

26        114. The allegations in Paragraph 114 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 114 that are directed at Display.

1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 114, and therefore denies the allegations.

3 115. The allegations in Paragraph 115 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
5 response is required, Display denies the allegations in Paragraph 115 that are directed at Display.  
6 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
7 allegations in Paragraph 115, and therefore denies the allegations.

8 116. Display lacks sufficient knowledge or information to form a belief as to the truth of  
9 the allegations in Paragraph 116 of the Complaint, and therefore denies the allegations.

10 117. To the extent the allegations in Paragraph 117 of the Complaint purport to refer to  
11 Display, Display denies the allegations. Display lacks sufficient knowledge or information to form  
12 a belief as to the truth of the remaining allegations in Paragraph 117, and therefore denies the  
13 allegations.

14 118. Display lacks sufficient knowledge or information to form a belief as to the truth of  
15 the allegations in Paragraph 118 of the Complaint, and therefore denies the allegations.

16 119. Display lacks sufficient knowledge or information to form a belief as to the truth of  
17 the allegations in Paragraph 119 of the Complaint, and therefore denies the allegations.

18 120. Display lacks sufficient knowledge or information to form a belief as to the truth of  
19 the allegations in Paragraph 120 of the Complaint, and therefore denies the allegations.

20 121. Display lacks sufficient knowledge or information to form a belief as to the truth of  
21 the allegations in Paragraph 121 of the Complaint, and therefore denies the allegations.

22 122. Display lacks sufficient knowledge or information to form a belief as to the truth of  
23 the allegations in Paragraph 122, and therefore denies the allegations.

24 123. Display lacks sufficient knowledge or information to form a belief as to the truth of  
25 the allegations in Paragraph 123 of the Complaint, and therefore denies the allegations.

26 124. The first, second, third, fourth, fifth and eighth sentences of Paragraph 124 of the  
27 Complaint purport to quote or describe statements by regulatory authorities. Display states that the  
28 original statements are the best source for their full context and content. The allegations in the sixth



1 and seventh sentences contain characterizations, conclusions, and legal argument to which no  
2 responsive pleading is required. To the extent a response is required, Display lacks sufficient  
3 knowledge or information to form a belief as to the truth of the allegations in Paragraph 124, and  
4 therefore denies the allegations.

5 125. Display lacks sufficient knowledge or information to form a belief as to the truth of  
6 the allegations in Paragraph 125 of the Complaint, and therefore denies the allegations.

7 126. The allegations in Paragraph 126 purport to quote or describe an announcement from  
8 the Department of Justice. Display states that the original announcement is the best source for its  
9 full content and context. To the extent a response is required, Display lacks sufficient knowledge or  
10 information to form a belief as to the truth of the allegations and therefore denies the allegations.

11 127. Display lacks sufficient knowledge or information to form a belief as to the truth of  
12 the allegations in Paragraph 127 of the Complaint, and therefore denies the allegations.

13 128. The allegations in Paragraph 128 purport to quote or describe an announcement from  
14 the European Commission. Display states that the original announcement is the best source for its  
15 full content and context. To the extent a response is required, Display lacks sufficient knowledge or  
16 information to form a belief as to the truth of the allegations and therefore denies the allegations.

17 129. The allegations in Paragraph 129 of the Complaint purport to quote or describe  
18 announcements from certain defendants. Display states that the original announcements are the best  
19 source for their full content and context. To the extent a response is required, Display lacks sufficient  
20 knowledge or information to form a belief as to the truth of the allegations in Paragraph 129, and  
21 therefore denies the allegations.

22 130. The allegations in Paragraph 130 of the Complaint purport to quote or describe  
23 statements from a defendant. Display states that the original statements are the best source for their  
24 full content and context. Display lacks sufficient knowledge or information to form a belief as to the  
25 truth of the allegations in Paragraph 130, and therefore denies the allegations.

26 131. The allegations in Paragraph 131 of the Complaint purport to quote or describe  
27 statements from a defendant. Display states that the original statements are the best source for their  
28



1 full content and context. Display lacks sufficient knowledge or information to form a belief as to the  
2 truth of the allegations in Paragraph 131, and therefore denies the allegations.

3 132. The allegations in Paragraph 132 of the Complaint purport to quote or describe an  
4 article from the International Herald Tribune. Display states that the original article is the best source  
5 for its full content and context. Display lacks sufficient knowledge or information to form a belief  
6 as to the truth of the allegations in Paragraph 132, and therefore denies the allegations.

7 133. The allegations in Paragraph 133 of the Complaint purport to quote or describe an  
8 announcement from the Hungarian Competition Authority. Display states that the original  
9 announcement is the best source for its full content and context. To the extent a response is required,  
10 Display lacks sufficient knowledge or information to form a belief as to the truth of the allegations  
11 and therefore denies the allegations.

12 134. Display denies the allegations in Paragraph 134 of the Complaint that are directed at  
13 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
14 remaining allegations in Paragraph 134, and therefore denies the allegations.

15 135. Display denies the allegations in Paragraph 135 of the Complaint that are directed at  
16 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
17 remaining allegations in Paragraph 135 and therefore denies the allegations.

18 136. Display denies the allegations in Paragraph 136 of the Complaint that are directed at  
19 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
20 remaining allegations in Paragraph 136, and therefore denies the allegations.

21 137. Display denies the allegations in Paragraph 137 of the Complaint that are directed at  
22 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
23 remaining allegations in Paragraph 137, and therefore denies the allegations.

24 138. The allegations in Paragraph 138 of the Complaint contain characterizations,  
25 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
26 response is required, Display denies the allegations in Paragraph 138 that are directed at Display.  
27 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
28 allegations in Paragraph 138, and therefore denies the allegations.

1           139. The allegations in Paragraph 139 of the Complaint contain characterizations,  
2 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
3 response is required, Display denies the allegations in Paragraph 139 that are directed at Display.  
4 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
5 allegations in Paragraph 139, and therefore denies the allegations.

6           140. The allegations in Paragraph 140 of the Complaint contain characterizations,  
7 conclusions, and legal argument to which no responsive pleading is required. Display denies the  
8 allegations in Paragraph 140 that are directed at Display. Display lacks sufficient knowledge or  
9 information to form a belief as to the truth of the remaining allegations in Paragraph 140, and  
10 therefore denies the allegations.

11           141. The allegations in Paragraph 141 of the Complaint, including all subparts, contain  
12 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
13 the extent a response is required, Display denies the allegations in Paragraph 141 of the Complaint  
14 that are directed at Display. Display lacks sufficient knowledge or information to form a belief as to  
15 the truth of the remaining allegations in Paragraph 141, and therefore denies the allegations.

16           142. Display denies the allegations in Paragraph 142 that are directed at Display. Display  
17 lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations  
18 in Paragraph 142, and therefore denies the allegations.

19           143. Display denies the allegations in Paragraph 143 of the Complaint that are directed at  
20 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
21 remaining allegations in Paragraph 143, and therefore denies the allegations.

22           144. The allegations in Paragraph 144 of the Complaint, including all subparts, contain  
23 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
24 the extent a response is required, Display denies the allegations in Paragraph 144 that are directed at  
25 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
26 remaining allegations in Paragraph 144, and therefore denies the allegations.

27           145. The allegations in Paragraph 145 of the Complaint, including all subparts, contain  
28 characterizations, conclusions, and legal argument to which no responsive pleading is required. To

1 the extent a response is required, Display denies the allegations in Paragraph 145 that are directed at  
2 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
3 remaining allegations in Paragraph 145, and therefore denies the allegations.

4 146. The allegations in Paragraph 146 of the Complaint, including all subparts, contain  
5 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
6 the extent a response is required, Display denies the allegations in Paragraph 146 that are directed at  
7 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
8 remaining allegations in Paragraph 146, and therefore denies the allegations.

9 147. The allegations in Paragraph 147 of the Complaint, including all subparts, contain  
10 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
11 the extent a response is required, Display denies the allegations in Paragraph 147 that are directed at  
12 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
13 remaining allegations in Paragraph 147, and therefore denies the allegations.

14 148. The allegations in Paragraph 148 of the Complaint, including all subparts, contain  
15 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
16 the extent a response is required, Display denies the allegations in Paragraph 148 that are directed at  
17 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
18 remaining allegations in Paragraph 148, and therefore denies the allegations.

19 149. Display denies the allegations in Paragraph 149 of the Complaint that are directed at  
20 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
21 remaining allegations in Paragraph 149, and therefore denies the allegations.

22 150. Display denies the allegations in Paragraph 150 of the Complaint that are directed at  
23 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
24 remaining allegations in Paragraph 150, and therefore denies the allegations.

25 151. The allegations in Paragraph 151 of the Complaint, including all subparts, contain  
26 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
27 the extent a response is required, Display denies the allegations in Paragraph 151 that are directed at  
28

1 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
2 remaining allegations in Paragraph 151, and therefore denies the allegations.

3 152. The allegations in Paragraph 152 of the Complaint, including all subparts, contain  
4 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
5 the extent a response is required, Display denies the allegations in Paragraph 152 that are directed at  
6 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
7 remaining allegations in Paragraph 152, and therefore denies the allegations.

8 153. The allegations in Paragraph 153 of the Complaint, including all subparts, contain  
9 characterizations, conclusions, and legal argument to which no responsive pleading is required. To  
10 the extent a response is required, Display denies the allegations in Paragraph 153 that are directed at  
11 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
12 remaining allegations in Paragraph 153, and therefore denies the allegations.

13 154. The allegations in Paragraph 154 of the Complaint contain characterizations,  
14 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
15 response is required, Display denies the allegations in Paragraph 154 that are directed at Display.  
16 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
17 allegations in Paragraph 154, and therefore denies the allegations.

18 155. The allegations in Paragraph 155 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations in Paragraph 155 that are directed at Display.  
21 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
22 allegations in Paragraph 155, and therefore denies the allegations.

23 156. The allegations in Paragraph 156 of the Complaint contain characterizations,  
24 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
25 response is required, Display denies the allegations in Paragraph 156 that are directed at Display.  
26 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
27 allegations in Paragraph 156, and therefore denies the allegations.  
28

1           157. The allegations in Paragraph 157 of the Complaint contain characterizations,  
2 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
3 response is required, Display denies the allegations in Paragraph 157 that are directed at Display.  
4 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
5 allegations in Paragraph 157, and therefore denies the allegations.

6           158. The allegations in Paragraph 158 of the Complaint contain characterizations,  
7 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
8 response is required, Display denies the allegations in Paragraph 158 that are directed at Display.  
9 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
10 allegations in Paragraph 158, and therefore denies the allegations.

11           159. The allegations in Paragraph 159 of the Complaint contain characterizations,  
12 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
13 response is required, Display denies the allegations in Paragraph 159 that are directed at Display.  
14 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
15 allegations in Paragraph 159, and therefore denies the allegations.

16           160. The allegations in Paragraph 160 of the Complaint contain characterizations,  
17 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
18 response is required, Display denies the allegations in Paragraph 160 that are directed at Display.  
19 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
20 allegations in Paragraph 160, and therefore denies the allegations.

21           161. The allegations in Paragraph 161 of the Complaint contain characterizations,  
22 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
23 response is required, Display denies the allegations in Paragraph 161 that are directed at Display.  
24 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
25 allegations in Paragraph 161, and therefore denies the allegations.

26           162. The allegations in Paragraph 162 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 162 that are directed at Display.

1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 162, and therefore denies the allegations.

3 163. The allegations in Paragraph 163 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
5 response is required, Display denies the allegations in Paragraph 163 that are directed at Display.  
6 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
7 allegations in Paragraph 163, and therefore denies the allegations.

8 164. The allegations in Paragraph 164 of the Complaint contain characterizations,  
9 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
10 response is required, Display denies the allegations in Paragraph 164 that are directed at Display.  
11 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
12 allegations in Paragraph 164, and therefore denies the allegations.

13 165. The allegations in Paragraph 165 of the Complaint contain characterizations,  
14 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
15 response is required, Display denies the allegations in Paragraph 165 that are directed at Display.  
16 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
17 allegations in Paragraph 165, and therefore denies the allegations.

18 166. The allegations in Paragraph 166 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations in Paragraph 166 that are directed at Display.  
21 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
22 allegations in Paragraph 166, and therefore denies the allegations.

23 167. The allegations in Paragraph 167 of the Complaint contain characterizations,  
24 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
25 response is required, Display denies the allegations in Paragraph 167 that are directed at Display.  
26 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
27 allegations in Paragraph 167, and therefore denies the allegations.

1           168. The allegations in Paragraph 168 of the Complaint contain characterizations,  
2 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
3 response is required, Display denies the allegations in Paragraph 168 that are directed at Display.  
4 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
5 allegations in Paragraph 168, and therefore denies the allegations.

6           169. The allegations in Paragraph 169 of the Complaint contain characterizations,  
7 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
8 response is required, Display denies the allegations in Paragraph 169 that are directed at Display.  
9 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
10 allegations in Paragraph 169, and therefore denies the allegations.

11           170. The allegations in Paragraph 170 of the Complaint contain characterizations,  
12 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
13 response is required, Display denies the allegations in Paragraph 170 that are directed at Display.  
14 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
15 allegations in Paragraph 170, and therefore denies the allegations.

16           171. The allegations in Paragraph 171 of the Complaint contain characterizations,  
17 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
18 response is required, Display denies the allegations in Paragraph 171 that are directed at Display.  
19 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
20 allegations in Paragraph 171, and therefore denies the allegations.

21           172. The allegations in Paragraph 172 of the Complaint contain characterizations,  
22 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
23 response is required, Display denies the allegations in Paragraph 172 that are directed at Display.  
24 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
25 allegations in Paragraph 172, and therefore denies the allegations.

26           173. The allegations in Paragraph 173 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 173 that are directed at Display.



1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 173, and therefore denies the allegations.

3 174. The allegations in Paragraph 174 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
5 response is required, Display denies the allegations in Paragraph 174 that are directed at Display.  
6 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
7 allegations in Paragraph 174, and therefore denies the allegations.

8 175. The allegations in Paragraph 175 of the Complaint contain characterizations,  
9 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
10 response is required, Display denies the allegations in Paragraph 175 that are directed at Display.  
11 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
12 allegations in Paragraph 175, and therefore denies the allegations.

13 176. Display denies the allegations in Paragraph 176 of the Complaint that are directed at  
14 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
15 remaining allegations in Paragraph 176, and therefore denies the allegations.

16 177. Display lacks sufficient knowledge or information to form a belief as to the truth of  
17 the allegations in Paragraph 177, of the Complaint and therefore denies the allegations.

18 178. Display denies the allegations in Paragraph 178 of the Complaint that are directed at  
19 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
20 remaining allegations in Paragraph 178, and therefore denies the allegations.

21 179. The allegations in Paragraph 179 of the Complaint contain characterizations,  
22 conclusions, and legal argument to which no responsive pleading is required. To the extent a  
23 response is required, Display denies the allegations in Paragraph 179 that are directed at Display.  
24 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
25 allegations in Paragraph 179, and therefore denies the allegations.

26 180. The allegations in Paragraph 180 of the Complaint contain characterizations,  
27 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
28 response is required, Display denies the allegations in Paragraph 180 that are directed at Display.



1 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
2 allegations in Paragraph 180, and therefore denies the allegations.

3 181. Display denies the allegations in Paragraph 181 of the Complaint that are directed at  
4 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
5 remaining allegations in Paragraph 181, and therefore denies the allegations.

6 182. Display lacks sufficient knowledge or information to form a belief as to the truth of  
7 the allegations in Paragraph 182 of the Complaint, and therefore denies the allegations.

8 183. Display lacks sufficient knowledge or information to form a belief as to the truth of  
9 the allegations in the first sentence of Paragraph 183 of the Complaint, and therefore denies the  
10 allegations. The second and third sentences purport to quote or describe statements by another  
11 defendant. Display states that the original statements are the best source for their full content and  
12 context. To the extent a response is required, Display lacks sufficient knowledge or information to  
13 form a belief as to the truth of the remaining allegations in Paragraph 183, and therefore denies the  
14 allegations.

15 184. The allegations in Paragraph 184 of the Complaint purport to quote or describe  
16 statements by another defendant. Display states that the original statements are the best source for  
17 their full content and context. To the extent a response is required, Display lacks sufficient  
18 knowledge or information to form a belief as to the truth of the allegations in Paragraph 184, and  
19 therefore denies the allegations.

20 185. Display lacks sufficient knowledge or information to form a belief as to the truth of  
21 the allegations in Paragraph 185 of the Complaint, and therefore denies the allegations.

22 186. Display lacks sufficient knowledge or information to form a belief as to the truth of  
23 the allegations in Paragraph 186 of the Complaint, and therefore denies the allegations.

24 187. Display lacks sufficient knowledge or information to form a belief as to the truth of  
25 the allegations in the first sentence of Paragraph 187 of the Complaint, and therefore denies the  
26 allegations. The second sentence of Paragraph 187 purports to quote or describe statements by  
27 another defendant. Display states that the original statements are the best source for their full content  
28 and context. To the extent a response is required, Display lacks sufficient knowledge or information

1 to form a belief as to the truth of the remaining allegations in Paragraph 187, and therefore denies  
2 the allegations.

3 188. The allegations in Paragraph 188 of the Complaint contain characterizations,  
4 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
5 response is required, Display denies the allegations in the first and fourth sentences of Paragraph  
6 188 that are directed at Display. Display lacks sufficient information to form a belief as to the truth  
7 of the remaining allegations in the first and fourth sentences, and therefore denies the allegations.  
8 The second and third sentences purport to quote or describe analyst reports. Display states that the  
9 original reports are the best source for their full content and context. To the extent a response is  
10 required, Display lacks sufficient knowledge or information to form a belief as to the truth of the  
11 remaining allegations in Paragraph 188, and therefore denies the allegations.

12 189. Paragraph 189 of the Complaint purports to quote or describe statements from an  
13 unnamed industry source. Display states that the original statements are the best source for their full  
14 content and context. Display lacks sufficient knowledge or information to form a belief as to the  
15 truth of the allegations in Paragraph 189, and therefore denies the allegations.

16 190. Display lacks sufficient knowledge or information to form a belief as to the truth of  
17 the allegations in Paragraph 190 of the Complaint, and therefore denies the allegations.

18 191. The allegations in Paragraph 191 of the Complaint contain characterizations,  
19 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
20 response is required, Display denies the allegations in the third sentence of Paragraph 191 that are  
21 directed at Display. The first and second sentences purport to quote or describe statements from a  
22 CNET News.com article. Display states that the original article is the best source for their full content  
23 and context. To the extent a response is required, Display lacks sufficient knowledge or information  
24 to form a belief as to the truth of the remaining allegations in Paragraph 191, and therefore denies  
25 the allegations.

26 192. The second sentence of Paragraph 192 of the Complaint purports to quote or describe  
27 statements from a keynote speaker at an annual conference. Display states that the original  
28 statements are the best source for their full content and context. Display lacks sufficient knowledge

1 or information to form a belief as to the truth of the allegations in Paragraph 192, and therefore  
2 denies the allegations.

3 193. Display lacks sufficient knowledge or information to form a belief as to the truth of  
4 the allegations in the first and second sentences of Paragraph 193 of the Complaint, and therefore  
5 denies the allegations. The third sentence of Paragraph 193 contains characterizations, conclusions,  
6 and legal argument to which no responsive pleading is required. To the extent a response is required,  
7 Display denies the allegations that are directed at Display. Display lacks sufficient knowledge or  
8 information to form a belief as to the truth of the remaining allegations in Paragraph 193, and  
9 therefore denies the allegations.

10 194. Paragraph 194 of the Complaint purports to quote or describe statements from an  
11 unnamed article. Display states that the original article is the best source for their full content and  
12 context. To the extent a response is required, Display lacks sufficient knowledge or information to  
13 form a belief as to the truth of the allegations in Paragraph 194, and therefore denies the allegations.

14 195. Display lacks sufficient knowledge or information to form a belief as to the truth of  
15 the allegations in Paragraph 195 of the Complaint, and therefore denies the allegations.

16 196. The allegations in Paragraph 196 of the Complaint contain characterizations,  
17 conclusions, and legal argument to which no responsive pleading is required. The third sentence  
18 purports to quote or describe statements from a television maker. Display states that the original  
19 statements are the best source for their full content and context. To the extent that a response is  
20 required, Display denies the allegations in Paragraph 196 that are directed at Display. Display lacks  
21 sufficient knowledge or information to form a belief as to the truth of the remaining allegations in  
22 Paragraph 196, and therefore denies the allegations.

23 197. The allegations in Paragraph 197 of the Complaint contain characterizations,  
24 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
25 response is required, Display denies the allegations in Paragraph 197 that are directed at Display.  
26 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
27 allegations in Paragraph 197, and therefore denies the allegations.

1           198. The allegations in Paragraph 198 of the Complaint contain characterizations,  
2 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
3 response is required, Display denies all allegations in Paragraph 198, including as to each subpart.

4           199. The allegations in Paragraph 199 of the Complaint contain characterizations,  
5 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
6 response is required, Display denies all allegations in Paragraph 199.

7           200. The allegations in Paragraph 200 of the Complaint contain characterizations,  
8 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
9 response is required, Display denies the allegations in Paragraph 200 that are directed at Display.  
10 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
11 allegations in Paragraph 200, and therefore denies the allegations.

12           201. The allegations in Paragraph 201 of the Complaint contain characterizations,  
13 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
14 response is required, Display denies the allegations in Paragraph 201 that are directed at Display.  
15 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
16 allegations in Paragraph 201, and therefore denies the allegations.

17           202. The allegations in Paragraph 202 of the Complaint contain characterizations,  
18 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
19 response is required, Display denies the allegations in Paragraph 202 that are directed at Display.  
20 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
21 allegations in Paragraph 202, and therefore denies the allegations.

22           203. The allegations in Paragraph 203 of the Complaint contain characterizations,  
23 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
24 response is required, Display denies the allegations in Paragraph 203 that are directed at Display.  
25 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
26 allegations in Paragraph 203, and therefore denies the allegations.

27           204. The allegations in Paragraph 204 of the Complaint contain characterizations,  
28 conclusions, and legal argument to which no responsive pleading is required. To the extent that a

1 response is required, Display denies the allegations in Paragraph 204 that are directed at Display.  
2 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
3 allegations in Paragraph 204, and therefore denies the allegations.

4 205. Display denies the allegations in Paragraph 205 of the Complaint that are directed at  
5 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
6 remaining allegations in Paragraph 205, and therefore denies the allegations.

7 206. Display denies the allegations in Paragraph 206 of the Complaint that are directed at  
8 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
9 remaining allegations in Paragraph 206, and therefore denies the allegations.

10 207. Display lacks sufficient knowledge or information to form a belief as to the truth of  
11 the allegations in the first and second sentences of Paragraph 207 of the Complaint, and therefore  
12 denies the allegations. Display denies the allegations in the third sentence of Paragraph 207 that are  
13 directed at Display. Display lacks sufficient knowledge or information to form a belief as to the truth  
14 of the remaining allegations in the third sentence of Paragraph 207, and therefore denies the  
15 allegations.

16 208. Display lacks sufficient knowledge or information to form a belief as to the truth of  
17 the allegations in the first and second sentences of Paragraph 208 of the Complaint, and therefore  
18 denies the allegations. Display denies the allegations in the third sentence of Paragraph 208 that are  
19 directed at Display. Display lacks sufficient knowledge or information to form a belief as to the truth  
20 of the remaining allegations in the third sentence of Paragraph 208, and therefore denies the  
21 allegations.

22 209. The third sentence of Paragraph 209 of the Complaint purports to quote or describe  
23 statements from a Deputy General Manager for an LG Electronics distributor. Display states that the  
24 original statements are the best source for their full content and context. Display denies the  
25 allegations of Paragraph 209 that are directed at Display. Display lacks sufficient knowledge or  
26 information to form a belief as to the truth of the remaining allegations of Paragraph 209, and  
27 therefore denies the allegations.  
28

1           210. Display denies the allegations in Paragraph 210 of the Complaint that are directed at  
2 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
3 remaining allegations in Paragraph 210, and therefore denies the allegations.

4           211. Display denies the allegations in Paragraph 211 of the Complaint that are directed at  
5 Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the  
6 remaining allegations in Paragraph 211, and therefore denies the allegations.

7           212. The allegations in Paragraph 212 of the Complaint contain characterizations,  
8 conclusions, and legal argument to which no responsive pleading is required. To the extent that a  
9 response is required, Display denies the allegations in Paragraph 212 that are directed at Display.  
10 Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining  
11 allegations in Paragraph 212, and therefore denies the allegations.

12                           **VIII. CLAIM FOR VIOLATIONS OF 15 U.S.C. § 1**

13           213. Display repeats and incorporates by reference its responses to Paragraphs 1 through  
14 212 of the Complaint as if fully set forth herein.

15           214. The allegations in Paragraph 214 of the Complaint contain legal contentions and/or  
16 conclusions to which no response is required. To the extent that a response is required, Display  
17 denies all allegations in Paragraph 214 that are directed at Display. Display lacks sufficient  
18 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
19 214, and therefore denies the allegations.

20           215. The allegations in Paragraph 215 of the Complaint contain legal contentions and/or  
21 conclusions to which no response is required. To the extent that a response is required, Display  
22 denies all allegations in Paragraph 215 that are directed at Display. Display lacks sufficient  
23 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
24 215, and therefore denies the allegations.

25           216. The allegations in Paragraph 216 of the Complaint contain legal contentions and/or  
26 conclusions to which no response is required. To the extent that a response is required, Display  
27 denies all allegations in Paragraph 216 that are directed at Display. Display lacks sufficient  
28

1 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
2 216, and therefore denies the allegations.

3 217. Display denies all allegations in Paragraph 217 that are directed at Display. Display  
4 lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations  
5 in Paragraph 217, and therefore denies the allegations.

6 218. The allegations in Paragraph 218 of the Complaint contain legal contentions and/or  
7 conclusions to which no response is required. To the extent that a response is required, Display  
8 denies all allegations in Paragraph 218 that are directed at Display. Display lacks sufficient  
9 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
10 218, and therefore denies the allegations.

11 219. The allegations in Paragraph 219 of the Complaint contain legal contentions and/or  
12 conclusions to which no response is required. To the extent that a response is required, Display  
13 denies all allegations in Paragraph 219 that are directed at Display. Display lacks sufficient  
14 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
15 219, and therefore denies the allegations.

16 220. The allegations in Paragraph 220 of the Complaint contain legal contentions and/or  
17 conclusions to which no response is required. To the extent that a response is required, Display  
18 denies all allegations in Paragraph 220, including all subparts, that are directed at Display. Display  
19 lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations  
20 in Paragraph 220, and therefore denies the allegations.

21 221. The allegations in Paragraph 221 of the Complaint contain legal contentions and/or  
22 conclusions to which no response is required. To the extent that a response is required, Display  
23 denies all allegations in Paragraph 221 that are directed at Display. Display lacks sufficient  
24 knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph  
25 221, and therefore denies the allegations.

## 26 **IX. DAMAGES**

27 222. The allegations in Paragraph 222 of the Complaint contain legal contentions and/or  
28 conclusions to which no response is required. To the extent that a response is required, Display



denies all allegations in Paragraph 222 that are directed at Display. Display lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 222, and therefore denies the allegations.

#### **X. PRAYER FOR RELIEF**

Display denies that Plaintiffs suffered any injury or incurred any damages by any act or omission of Display as alleged in the Complaint, and further denies that Plaintiffs are entitled to any relief under any theory by means of the allegations set forth in each of the paragraphs and their subparts in the Complaint

#### **XI. JURY TRIAL DEMAND**

The allegations set forth under the heading “Jury Trial Demanded” contain no factual assertions for which a response is required. To the extent that a response is required, Display denies the allegations contained under the heading “Jury Trial Demanded.”

#### **DEFENSES**

Display does not intend to waive, and hereby expressly reserves, its ability to present evidence that Plaintiffs cannot meet their burden of proof to establish each element of their claims, including causation and damages, and to amend this Answer as necessary. Without assuming any burden it would not otherwise bear, Display asserts the following additional and/or affirmative defenses to Plaintiffs’ Complaint:

#### **FIRST DEFENSE**

##### **(Failure to State a Claim)**

The Complaint fails to state a claim upon which relief can be granted.

#### **SECOND DEFENSE**

##### **(Failure to State a Claim Under the Foreign Trade Antitrust Improvements Act)**

Plaintiffs’ claims for any foreign purchases, if any, should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs have failed to allege facts sufficient to support a claim under the Foreign Trade Antitrust Improvements Act, 15 U.S.C. § 6a.



**THIRD DEFENSE****(Conduct Outside of the United States)**

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, because the alleged conduct of Display that is the subject of the Complaint either occurred outside the jurisdiction of the Court or was neither directed to nor affected persons, entities, trade or commerce in the United States, or both.

**FOURTH DEFENSE****(Vagueness of Claims)**

Plaintiffs' claims should be dismissed for uncertainty and vagueness and because their claims are ambiguous, and/or unintelligible. Display avers that Plaintiffs' claims do not describe the events or legal theories with sufficient particularity to permit Display to ascertain what other defenses may exist. Display therefore reserves the right to amend its Answer to assert additional defenses and/or supplement, alter, or change its Answer and/or defenses upon the discovery of more definitive facts upon the completion of its investigation and discovery.

**FIFTH DEFENSE****(Failure to Allege Fraud or Fraudulent Conspiracy with Particularity)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs have failed to allege fraud or fraudulent concealment with sufficient particularity.

**SIXTH DEFENSE****(Failure to Plead Conspiracy with Particularity)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs have failed to allege conspiracy with sufficient particularity.

**SEVENTH DEFENSE****(Statute of Limitation)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the applicable statute(s) of limitations.

**EIGHTH DEFENSE****(Unilateral Action)**

Plaintiffs' claims and the claims of any putative class members are barred, in whole or in part, because the actions or practices of Display that are the subject of the Complaint were undertaken unilaterally for legitimate business reasons and in pursuit of Display's independent interests and those of its customers, and were not the product of any contract, combination or conspiracy between Display and any other person or entity.

**NINTH DEFENSE****(No Antitrust Injury)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, because Plaintiffs and/or certain members of the putative classes have failed to allege "antitrust injury" – i.e., injury that is of the type the antitrust laws were intended to remedy.

**TENTH DEFENSE****(Competition)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, because any acts or practices of Display that are the subject of the Complaint were cost justified or otherwise economically justified and resulted from a good faith effort to meet competition or market conditions.

**ELEVENTH DEFENSE****(Non-actionable or Governmental Privilege)**

Plaintiffs' claims are barred, in whole or in part, because the alleged conduct of Display that is the subject of the Complaint was caused by, due to, based upon, or in response to directives, laws, regulations, policies, and/or acts of governments, governmental agencies and entities, and/or regulatory agencies, and such is non-actionable or privileged.

**TWELFTH DEFENSE****(State Action)**

Plaintiffs' claims are barred, in whole or in part, because the alleged conduct of Display that is the subject of the Complaint was caused by or in response to duly enacted laws and/or regulations

of the People's Republic of China and is therefore protected under the foreign sovereign compulsion doctrine, the act of state doctrine, and international comity.

### **THIRTEENTH DEFENSE**

#### **(No Act of Display)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because no plaintiff has been injured in its business or property by reason of any action of Display.

### **FOURTEENTH DEFENSE**

#### **(Intervening Conduct)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, because any alleged injuries and/or damages were not legally or proximately caused by any acts or omissions of Display and/or were caused, if at all, solely and proximately by the conduct of third parties including, without limitations, the prior, intervening or superseding conduct of such third parties.

### **FIFTEENTH DEFENSE**

#### **(*Ultra Vires*)**

To the extent that any actionable conduct occurred, Plaintiffs claims and the claims of any putative class members against Display are barred because all such conduct would have been committed by individuals acting *ultra vires*.

### **SIXTEENTH DEFENSE**

#### **(Damages Passed On)**

Plaintiffs' claims should be dismissed to the extent they are barred, in whole or in part, because any injury or damage alleged in the Complaint, which Display specifically denies, was passed on to persons or entities other than the Plaintiffs and/or was passed on by Plaintiffs to other parties.

### **SEVENTEENTH DEFENSE**

#### **(Legal Acts)**

Plaintiffs' claims are barred, in whole or in part, to the extent they are based on alleged acts, conduct or statements that are specifically permitted by law.

**EIGHTEENTH DEFENSE****(Failure to Mitigate Damages)**

Plaintiffs' claims should be dismissed, in whole or in part, because Plaintiffs and/or certain members of the putative class failed to take all necessary, reasonable, and appropriate actions to mitigate their alleged damages, if any.

**NINETEENTH DEFENSE****(Unjust Enrichment)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, because Plaintiffs and/or certain members of the putative class would be unjustly enriched if they were allowed to recover any part of the damages alleged in the Amended Complaint.

**TWENTIETH DEFENSE****(Set Off)**

Without admitting that Plaintiffs are entitled to recover damages in this matter, Display is entitled to set off from any recovery Plaintiffs may obtain against Display any amount paid to Plaintiffs by any other Defendants who have settled, or do settle, Plaintiffs' claims in this matter.

**TWENTY-FIRST DEFENSE****(Withdrawal)**

To the extent that any actionable conduct occurred for which Display is liable, some or all of Plaintiffs' claims against Display are barred because Display withdrew from and/or abandoned any alleged conspiracy and thus Plaintiffs cannot establish liability or compensable damages as a matter of law on the basis that, among other things, Display withdrew and/or abandoned any alleged conspiracy prior to the commencement of the limitations period set forth in applicable statutes of limitations.

**TWENTY-SECOND DEFENSE****(Waiver and Estoppel)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the doctrines of waiver and/or estoppel.

**TWENTY-THIRD DEFENSE**

**(Laches)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the equitable doctrine of laches.

**TWENTY-FOURTH DEFENSE**

**(Unclean Hands)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by the equitable doctrine of unclean hands.

**TWENTY-FIFTH DEFENSE**

**(Acquiescence)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, by Plaintiffs' and/or certain members of the putative class acquiescence and/or confirmation of any and all conduct and/or omissions alleged as to Display.

**TWENTY-SIXTH DEFENSE**

**(Accord and Satisfaction)**

Plaintiffs' claims are barred, in whole or in part, by the doctrine of accord and satisfaction.

**TWENTY-SEVENTH DEFENSE**

**(*Forum Non Conveniens*)**

The Amended Complaint should be dismissed on the grounds of *forum non conveniens*.

**TWENTY-EIGHTH DEFENSE**

**(Improper Forum/Arbitration)**

Plaintiffs' claims and claims of any putative class members against Display are barred to the extent that they have agreed to arbitration or chosen a different forum for the resolution of their claims.

**TWENTY-NINETH DEFENSE**

**(Adequate Remedy at Law)**

Plaintiffs' claims for injunctive relief should be dismissed because Plaintiffs and/or certain members of the putative class have available an adequate remedy at law.

**THIRTIETH DEFENSE****(Failure to Join Indispensable Parties)**

Plaintiffs' claims should be dismissed to the extent that they are barred, in whole or in part, for failure to join indispensable parties.

**THIRTY-FIRST DEFENSE****(Due Process)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, to the extent they seek an improper multiple punitive award for a single wrong because such an award would violate Display's rights guaranteed by the Due Process clause of the Fifth Amendment of the United States Constitution.

**THIRTY-SECOND DEFENSE****(Due Process)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, to the extent they seek an improper multiple punitive award for a single wrong because such an award would violate Display's rights guaranteed by the Due Process provision of the Fourteenth Amendment of the United States Constitution.

**THIRTY-THIRD DEFENSE****(Equal Protection)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, to the extent they seek an improper multiple punitive award for a single wrong because such an award would violate Display's rights guaranteed by the Equal Protection provision of the Fourteenth Amendment of the United States Constitution.

**THIRTY-FOURTH DEFENSE****(Double Jeopardy)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, to the extent they seek an improper multiple punitive award for a single wrong because such an award would violate Display's rights guaranteed by the Double Jeopardy Clause of the Fifth Amendment of the United States Constitution.

**THIRTY-FIFTH DEFENSE****(Excessive Fines)**

Plaintiffs' claims and claims of any putative class members are barred, in whole or in part, to the extent they seek an improper multiple punitive award for a single wrong because such an award would violate Display's rights guaranteed by the Excessive Fines provision of the Eighth Amendment of the United States Constitution.

**THIRTY-SIXTH DEFENSE****(Unconstitutional Multiplicity)**

To the extent any recovery by Plaintiffs or members of the putative class would be duplicative of recovery by other plaintiffs and other lawsuits, subjecting Display to the possibility of multiple recoveries, such recovery is barred by the Fifth and Eighth Amendments to the United States Constitution.

**THIRTY-SEVENTH DEFENSE****(Foreign Sales)**

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs may not recover damages, if any, based on sales outside of the United States.

**THIRTY-EIGHTH DEFENSE****(Other Defenses Incorporated by Reference)**

Display adopts and incorporates by reference any and all other additional or affirmative defenses asserted or to be asserted by any other defendants.

**THIRTY-NINETH DEFENSE****(Reservation of Rights to Assert Additional Defenses)**

Display has not knowingly or intentionally waived any applicable defenses and explicitly reserves the right to assert and rely on such other applicable defenses as may become available or apparent during discovery proceedings. Display further reserves the right to amend its Answer and/or its defenses accordingly, and/or to delete defenses that it determines are not applicable during the course of subsequent discovery.



**WHEREFORE,** Display prays as follows:

1. That the Plaintiffs take nothing by way of the Complaint and the Complaint be dismissed with prejudice;

2. That judgment be entered in favor of Display and against Plaintiffs on each and every cause of action set forth in the Complaint;

3. That Display recover its costs of suit and attorneys' fees incurred herein; and

4. That Display be granted such other and further relief as the Court deems just and proper.

Dated: December 18, 2020

Respectfully submitted,

/s/ John M. Taladay

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